

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VICTOR BALLAST, LUIS SIMONE and MARQUIS  
RICHARDSON, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

-v-

WORKFORCE 7 INC., CONSOLIDATED EDISON  
COMPANY of NEW YORK, INC., VALI  
INDUSTRIES, INC. and RONALD HILTON, Jointly  
and Severally,

Defendants.

Civil Action No. 1:20-cv-03812 (ER)

**REVISED CIVIL CASE  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

**WHEREAS**, the Court having entered a Revised Civil Case Discovery Plan and Scheduling Order on September 12, 2022 (Dkt. No. 259);

**WHEREAS** the Parties have agreed to modify the September 12, 2022 Revised Civil Case Discovery Plan and Scheduling Order subject to the Court's approval;

**IT IS HEREBY ORDERED:**

1. The terms of the September 12, 2022 Revised Civil Case Discovery Plan and Scheduling Order shall continue in full force and effect except for the following modifications:


- a. Plaintiffs to exchange a damages spreadsheet based on records produced by Defendants summarizing the named and opt-in plaintiffs' alleged dates of work, the projects on which they worked and a summary of back wages and other damages claimed by December 9, 2022;
- b. Defendants' Oppositions to Plaintiffs' November 7, 2022 Motion to Join Parties and for Leave to Amend the Caption and Complaint (Dkt. Nos. 265-67, hereinafter Plaintiffs' "Motion to Amend") shall be due on or before

December 12, 2022;

- c. Plaintiffs' Reply to Defendants' Oppositions shall be due on or before January 9, 2023;
- d. Non-expert depositions shall be completed by March 17, 2023;
- e. Plaintiffs shall take the first step in class certification motion practice by May 17, 2023;
- f. Any further interrogatories shall be served no later than April 17, 2023;
- g. Requests to Admit, if any, shall be served no later than April 17, 2023;
- h. Expert reports shall be served no later than May 30, 2023;
- i. Rebuttal expert reports shall be served no later than June 30, 2023;
- j. Expert depositions shall be completed by August 28, 2023;
- k. **ALL DISCOVERY SHALL BE COMPLETED BY:** such date that is ninety (90) days from the date of a decision on Plaintiffs' class certification motion.

**SO ORDERED.**

Dated: November 29, 2022

  
\_\_\_\_\_  
HONORABLE EDGARDO RAMOS  
United States District Judge